

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Chad Williams	:	Chapter 13
	:	Case No.: 18-13585-MDC
Debtor(s)	:	

MOTION TO VACATE ORDER GRANTING RELIEF

Debtor, Chad Williams, by and through Attorney Brad J. Sadek moves this Honorable Court to vacate the August 5, 2021 Order Granting Relief from the Automatic Stay to U.S. Bank Trust National Association and in support thereof avers the following:

1. The above captioned bankruptcy matter was filed on May 31, 2018.
2. Creditor, U.S. Bank Trust National Association. filed a Motion for Relief of the Automatic Stay on October 31, 2018 regarding the debtor's property located at 1934 W. Spencer Street Philadelphia, PA 19141.
3. On January 4, 2019, a Stipulation of Settlement was entered permitting the debtor's post-petition mortgage arrears to be cured through an Amended Chapter 13 Plan. Per the terms of the Stipulation, debtor was to remain current on all post-petition payments due to U.S. Bank Trust National Association going forward.
4. A Certificate of Default of Stipulation was entered on July 27, 2021 by U.S. Bank Trust National Association.
5. An Order was entered on August 5, 2021 granting relief from the Automatic Stay to U.S. Bank Trust National Association.
6. Debtor has made several lump sum payments upon receipt of both the Certificate of Default and Order Granting Relief.

7. Debtor avers they will be able to cure any remaining arrears prior to this Motion's Hearing Date.
8. Debtor's counsel requests Movant to provide Debtor with the full post-petition accounting for the exact balance necessary to bring the account current.
9. The debtor wishes to retain their property located at 4253 Whiting Road Philadelphia, PA 19154 and knows that he must remain current in order to avoid any future attempts by U.S. Bank National Association to modify the Automatic Stay.

WHEREFORE, Debtor respectfully requests this Honorable Court to vacate the Order Granting Relief from the Automatic Stay in regards to the property located at 1934 W. Spencer Street Philadelphia, PA 19141, allowing the debtor to continue making regular post-petition payments.

Respectfully submitted,

/s/ Brad J. Sadek, Esquire
Brad J. Sadek, Esquire
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Dated: August 27, 2021